CONSULTING

December 26, 2018

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, D.C. 20554

RE: ***Ex parte filing*** in WC Docket No. 16-271

Dear Ms. Dortch:

On December 21, the undersigned from GVNW Consulting, Inc. (GVNW) conducted a telephonic *ex parte* meeting with Jesse Jachman, Attorney Advisor in the Wireline Competition Bureau's Telecommunications Access Policy Division on behalf of Arctic Slope Telephone Association Cooperative, Inc. (ASTAC).

The *ex parte* meeting included clarifications from ASTAC on their wireline Alaska Plan obligations, as noted in the redacted attachment. We also clarified that the 1 Mbps DSL product offering was upgraded to 384 kbps upload speed in February, 2018. This is now reflected in note 1 in the performance obligation table.

As required by the Commission's rules, this *ex parte* record is now filed in the above referenced docket. If there are any questions, please call me on 503-612-4409.

Sincerely,

Filed ECFS

Jeffry H. Smith
President and CEO

Enclosure – Revised note 1 to ASTAC performance obligations
Attachment A includes redacted material

Copy to

Jesse Jachman, FCC
Jens Laipenieks, ASTAC
Steve Merriam, ASTAC

Attachment A to December 21, 2018 ex parte for ASTAC with Jesse Jachman. ASTAC has chosen to redact competitively sensitive information in this attachment.

Which of ASTAC's communities will remain satellite fed middle-mile? Please also amplify why no commitment to upgrade these communities has been offered during the support term. (Answer below is redacted)

[redacted]

ASTAC references an economic model that shows why they cannot meet the benchmarks.

ASTAC previously submitted this information in a redacted form with the January 18, 2018 ex parte filed supporting its January 16, 2018 ex parte meeting with Alexander Minard, Suzanne Yelen and Jesse Jachman.

In Note 1, ASTAC states that it will update the Commission if product offerings improve. What is preventing any commitment over the support term to improve to something better than ASTAC currently offers? (Answer below is redacted)

[redacted]

Arctic Slope Telephone Association
Cooperative, Inc.
Alaska Plan Performance Obligations
Wireline
11/27/2018 Revision

	Note 1	Note 2					Note 3		Note 3
Middle Mile Facility	Speed to End User	Locations Passed 1/1/15	Locations Passed 1/1/18	Number of Locations At Benchmark 1/1/18	Percent of Locations At Benchmark 1/1/18	Number of Locations At Benchmark Year 5	Percent of Locations At Benchmark Year 5	Number of Locations At Benchmark Year 10	Percent of Locations At Benchmark Year 10
Satellite	1Mb/384k	2,509	398	398	100%	398	100%	398	100%
Hybrid Microwave-Fiber	4Mb/1Mb	206							
Hybrid Microwave-Fiber**	10Mb/1Mb		161	161	100%	161	100%	161	100%
Fiber*	4Mb/1Mb		-	411	100%			-	100%
Fiber**	10Mb/1Mb		2,156	1,745	100%	2,156	100%	2,156	100%
Fiber**	25Mb/3Mb								
Total		2,715	2,715	2,715		2,715		2,715	

Note 1: Residential speeds. In Fiber and Hybrid fed markets, ASTAC offers a 10/1Mbps best effort service with a $24.99/Mo access fee and metered usage ($2 per GB used up to 100 GB, $1 per GB after 101 GB and up). In the Satellite fed markets, ASTAC offers best effort speeds up to 1Mbps/384kbps service, including unlimited usage. ASTAC will update the Commission when our product offerings improve, triggered by improved economics** on the middle mile service.

Note 2: Residential and estimated business locations passed in ETC's network as of 12/31/15.
Note 3: Year 1 is 2017

* The Utqiagvik (Barrow) market is served via copper/DSL last mile and a subset of homes (411) are not able to receive 10/1. By June, 2019 ASTAC will have completed a $3M FTTH project to serve 100% of homes in market, as reflected in Year 5 numbers.

** ASTAC's last mile (FTTH) network is capable of delivering higher broadband speeds in all markets than what is offered, but is limited by middle mile network cost/capacity constraints. ASTAC is able to meet the latency requirements in those markets connected by Fiber and Hybrid Microwave-Fiber middle mile. ASTAC has demonstrated why the reasonably comparable rate requirement and delivered speed metrics are not feasible in any of its markets with use of a simple economic model. We can show that the prohibitive factor continues to be the high cost of middle mile transport.